

INVOICE



Invoice # 304
Date: 04/10/2024
Due On: 05/10/2024

Martin Law Group, P.C.

8065 Leesburg Pike, Suite 750
Vienna, VA 22182

Eagle Properties and Investments, LLC
445 Windover Ave. NW
Vienna, VA 22180

00053-Eagle Properties and Investments, LLC

Chapter 11 Representation

Type	Date	Attorney	Notes	Quantity	Rate	Total
Service	02/01/2024	JTM	z7 - Financing: Emails and phone calls regarding cash collateral issues	0.50	\$550.00	\$275.00
Service	02/05/2024	EK	z4 - Fee/Employment Applications: Put together Fee Application, fee application order, fee application notice, and fee application certificate.	2.80	\$310.00	\$868.00
Service	02/05/2024	JR	z4 - Fee/Employment Applications: Review second fee application.	0.60	\$485.00	\$291.00
Service	02/07/2024	JR	z3 - Asset Disposition: Coordinate seller documents with title company for execution by CRO re: 3002 Williamsburg.	0.20	\$485.00	\$97.00
Service	02/08/2024	JR	z4 - Fee/Employment Applications: App to employ VA broker Rule 2014 Statements	0.30	\$485.00	\$145.50
Service	02/12/2024	JR	z4 - Fee/Employment Applications: Finalize listing agreement for 2565 Chain Bridge Road and send to CRO for execution.	0.20	\$485.00	\$97.00
Service	02/12/2024	EK	z2 - Case Administration: Draft motion for approval of sale for 1203 cottage	1.80	\$310.00	\$558.00
Service	02/12/2024	JTM	z2 - Case Administration: Phone calls and emails regarding adequate protection payments and other issues	0.40	\$550.00	\$220.00

Service	02/13/2024	JTM	z3 - Asset Disposition: Attend hearing on Motion to Abandon; related meetings and phone calls	1.50	\$550.00	\$825.00
Service	02/13/2024	JR	z4 - Fee/Employment Applications: Review commercial broker's revisions to Verified Statement and Listing Agreement. Accept redlines and send final execution copies.	0.30	\$485.00	\$145.50
Service	02/16/2024	JTM	z8 - Relief from Stay Proceedings: Emails regarding Shore United motion for relief from stay	0.20	\$550.00	\$110.00
Service	02/19/2024	JTM	z3 - Asset Disposition: Phone call and emails with C. Rogan and others regarding Cottage Street and Lucy	0.70	\$550.00	\$385.00
Service	02/19/2024	JR	z10 - Litigation: Draft oppositions to motions to dismiss.	3.50	\$485.00	\$1,697.50
Service	02/20/2024	JTM	z10 - Litigation: Phone calls regarding Bala Jain adversary discovery and scheduling issues; attend pre-trial conference; review and comment on scheduling order	3.00	\$550.00	\$1,650.00
Service	02/20/2024	JTM	z3 - Asset Disposition: Emails regarding sales of PA properties	0.30	\$550.00	\$165.00
Service	02/20/2024	JR	z10 - Litigation: Shore United Opposition	1.50	\$485.00	\$727.50
Service	02/20/2024	JR	z10 - Litigation: Opposition to Motion to Dismiss and Answers to Counter-Complaint.	2.80	\$485.00	\$1,358.00
Service	02/20/2024	EK	z4 - Fee/Employment Applications: Review fee application prior to filing	0.20	\$310.00	\$62.00
Service	02/20/2024	EK	z10 - Litigation: Start draft of answer to counterclaim.	1.00	\$310.00	\$310.00
Service	02/20/2024	SP	z4 - Fee/Employment Applications: Prepare Fee Application package: Notice, Certificate (review attorney fees/hours, re-calculate time), Second Interim Application and Order. File with Court.	1.50	\$180.00	\$270.00
Service	02/21/2024	EK	z2 - Case Administration: Research and draft business conspiracy portion of motion to dismiss opposition	4.70	\$310.00	\$1,457.00
Service	02/22/2024	JTM	z3 - Asset Disposition: Phone calls and emails regarding Cottage St and Lucy Rd properties	0.20	\$550.00	\$110.00
Service	02/23/2024	JTM	z3 - Asset Disposition: Emails regarding Lucy and Cottage sales	0.40	\$550.00	\$220.00
Service	02/26/2024	JTM	z3 - Asset Disposition: Phone calls and	0.30	\$550.00	\$165.00

emails regarding sale of Lucy and other PA properties						
Service	02/26/2024	JTM	z8 - Relief from Stay Proceedings: Revise and file opposition to Motion for Relief from Stay - related emails	0.60	\$550.00	\$330.00
Service	02/26/2024	JTM	z3 - Asset Disposition: Emails and phone calls regarding Williamsburg Rd sale	0.40	\$550.00	\$220.00
Service	02/26/2024	JR	z10 - Litigation: Additional research and drafting of opposition to motion to dismiss.	1.20	\$485.00	\$582.00
Service	02/27/2024	JTM	z8 - Relief from Stay Proceedings: Revise Shore United lift stay order; related emails	0.20	\$550.00	\$110.00
Service	02/27/2024	JR	z3 - Asset Disposition: Draft motion to sell 71 Lucy Ave and 1203 Cottage Street; assemble exhibits; draft notice and order.	2.80	\$485.00	\$1,358.00
Service	02/27/2024	JR	z4 - Fee/Employment Applications: Review and revise Application to Employ Broker for 1010 Lynn Street.	0.90	\$485.00	\$436.50
Service	02/27/2024	JR	z4 - Fee/Employment Applications: Communication with Broker and CRO regarding signing of the Listing Agreement.	0.40	\$485.00	\$194.00
Service	02/27/2024	JR	z3 - Asset Disposition: Send three new listings to PA broker - 204 S. Fairville, 249 Berkstone and 1630 E. Chocolate.	0.40	\$485.00	\$194.00
Service	02/27/2024	EK	z4 - Fee/Employment Applications: Draft Application to employ broker and corresponding documents required for submission.	2.50	\$310.00	\$775.00
Service	02/28/2024	JR	z11 - Business Operations: Research re: 15474 Roxbury; need rental license, need to reinstate LLC and appoint registered agent; draft necessary documents.	1.00	\$485.00	\$485.00
Service	02/28/2024	JTM	z3 - Asset Disposition: Emails regarding Fulton Bank and Mainstreet Bank motions to approve sale	0.10	\$550.00	\$55.00
Service	02/28/2024	JTM	z10 - Litigation: Emails regarding Bala Jain scheduling order; review oppositions to motions to dismiss	0.10	\$550.00	\$55.00
Service	02/28/2024	JR	z3 - Asset Disposition: Draft/revise Motion to Approve Compromise.	1.80	\$485.00	\$873.00
Service	02/28/2024	EK	z11 - Business Operations: Conduct research on collecting rent in Maryland	1.00	\$310.00	\$310.00
Service	02/29/2024	JTM	z3 - Asset Disposition: Phone calls regarding sale of PA properties	0.20	\$550.00	\$110.00

Service	02/29/2024	EK	z4 - Fee/Employment Applications: Draft App to Employ Broker and corresponding documents	1.70	\$310.00	\$527.00
Service	03/01/2024	JTM	z10 - Litigation: Review and comment on Opposition to Motion to Dismiss	0.10	\$550.00	\$55.00
Service	03/01/2024	EK	z12 - Employee Benefits/Pensions: Update app to employ for Pennsylvania Properties.	0.30	\$310.00	\$93.00
Service	03/01/2024	EK	z10 - Litigation: Review and make edits to opposition to Motion to Dismiss	1.20	\$310.00	\$372.00
Service	03/04/2024	EK	z4 - Fee/Employment Applications: Correct app to employ and create exhibits.	0.80	\$310.00	\$248.00
Service	03/04/2024	JR	z3 - Asset Disposition: Summarize PA Offers for Mac; speak with realtor to get terms.	0.30	\$485.00	\$145.50
Service	03/05/2024	JTM	z2 - Case Administration: Phone calls and emails regarding insurance certificates and other issues [REDACTED]	0.50	\$550.00	\$275.00
Service	03/07/2024	JTM	z3 - Asset Disposition: Emails regarding property sale issues	0.30	\$550.00	\$165.00
Service	03/07/2024	JR	z3 - Asset Disposition: Finalize Application to Employ for 1010 Lynn.	0.60	\$485.00	\$291.00
Service	03/07/2024	JR	z10 - Litigation: Review answers and motions to dismiss filed by Bala Jain, Shail Butani and Ishwer Butani.	0.50	\$485.00	\$242.50
Service	03/07/2024	EK	z10 - Litigation: Search for and download notice of hearings from opposing parties and look up rules for deadline to respond to counter-complaint..	0.60	\$310.00	\$186.00
Service	03/08/2024	EK	z13 - Plan and Disclosure Statement: Review the 4 objections to the plan and summarize basis for objection, specific subsections of the plan that are objected to, and allegations of plan's infeasibility.	3.10	\$310.00	\$961.00
Service	03/11/2024	JR	z10 - Litigation: Oppositions to Motions to Dismiss in adversary proceeding.	0.40	\$485.00	\$194.00
Service	03/11/2024	JTM	z13 - Plan and Disclosure Statement: Phone call with D. Musgrave regarding abandonment and disclosure statement issues; prepare for disclosure statement hearing	1.60	\$550.00	\$880.00
Service	03/11/2024	JTM	z3 - Asset Disposition: Work on issues related to sales motions	0.70	\$550.00	\$385.00
Service	03/11/2024	JR	z10 - Litigation: Opposition to Motion to	0.40	\$485.00	\$194.00

Dismiss filed by Shail Butani.						
Service	03/11/2024	JR	z3 - Asset Disposition: Motions to Sell for 1203 Cottage and 71 Lucy.	1.10	\$485.00	\$533.50
Service	03/11/2024	JR	z4 - Fee/Employment Applications: Applications to Employ VA and PA Brokers.	0.60	\$485.00	\$291.00
Service	03/11/2024	JR	z3 - Asset Disposition: Motions to Sell 1001 Manning, 213 N. Port, 202 N. Port and 3012 Dupont back to secured lenders.	1.30	\$485.00	\$630.50
Service	03/11/2024	JR	z3 - Asset Disposition: Chain Bridge - Listing Agreement/App to Employ; send reminder to CRO to sign listing agreement.	0.30	\$485.00	\$145.50
Service	03/11/2024	EK	z10 - Litigation: Assist in drafting the opposition to Shail's and Ishwer's Motion to Dismiss	6.00	\$310.00	\$1,860.00
Service	03/11/2024	EK	z2 - Case Administration: Draft Notice of withdrawal	0.60	\$310.00	\$186.00
Service	03/12/2024	JTM	z13 - Plan and Disclosure Statement: Prepare for and attend hearing on disclosure statement	3.60	\$550.00	\$1,980.00
Service	03/12/2024	JTM	z3 - Asset Disposition	0.90	\$550.00	\$495.00
Service	03/12/2024	JR	z3 - Asset Disposition: Motion to Sell 202 N. Port.	0.50	\$485.00	\$242.50
Service	03/12/2024	JR	z2 - Case Administration: Motion for Reconsideration of Court's Order Converting Case to Chapter 7	2.00	\$485.00	\$970.00
Service	03/12/2024	EK	z2 - Case Administration: Make edits to App to employ real estate broker for VA and PA including corresponding documents. Additionally make edits to motion for approval of Sale for 1203 Cottage and 71 Lucy.	1.00	\$310.00	\$310.00
Service	03/13/2024	JR	z2 - Case Administration: Further revisions on Motion for Reconsideration.	1.10	\$485.00	\$533.50
Service	03/13/2024	JTM	z2 - Case Administration: Work on Motion to Reconsider	2.20	\$550.00	\$1,210.00
Service	03/13/2024	JR	z2 - Case Administration: Review and respond to broker's email (Subject: Jonestown and Linglestown)	0.20	\$485.00	\$97.00
Service	03/13/2024	JR	z3 - Asset Disposition: Review offer on 204 S. Fairville	0.20	\$485.00	\$97.00
Service	03/13/2024	JR	z2 - Case Administration: Review emails from JTM (Subject: Eagle - Motion to	0.20	\$485.00	\$97.00

Reconsider v1)						
Service	03/14/2024	JR	z2 - Case Administration: Revisions to Motion for Reconsideration; draft motion for expedited hearing; file both motions.	1.10	\$485.00	\$533.50
Service	03/14/2024	SP	Review emails on Motion for Reconsideration/ email regarding approval for filing.	0.20	\$180.00	\$36.00
Service	03/14/2024	SP	z2 - Case Administration: Prepare motion for filing/ review exhibits/ review expedited hearing motion/ file with Court/ email to Jack.	1.50	\$180.00	\$270.00
Service	03/14/2024	EK	z9 - Claims Administration and Objections: Assist with filing motion for reconsideration, meet with Steph to discuss, and edit motion to expedite hearing.	0.60	\$310.00	\$186.00
Service	03/14/2024	JR	z2 - Case Administration: Telephone calls to chambers re: expedited hearing dates.	0.10	\$485.00	\$48.50
Service	03/14/2024	JR	z2 - Case Administration: Coordinate filing of motions (Subject: Fw: Eagle - Motion to Reconsider)	0.20	\$485.00	\$97.00
Service	03/14/2024	JR	z2 - Case Administration: Draft email to David Musgrave (Subject: Fw: Eagle Properties Motion for Reconsideration Combined Filed)	0.20	\$485.00	\$97.00
Service	03/14/2024	JR	z2 - Case Administration: Calls to Judge's chambers to set hearing on Motion for Reconsideration.	0.20	\$485.00	\$97.00
Service	03/15/2024	JTM	z2 - Case Administration: Phone calls and emails regarding expedited hearing on motion to reconsider	0.30	\$550.00	\$165.00
Service	03/15/2024	SP	z2 - Case Administration: Review and revise notice of motion and hearing/ file with court	0.60	\$180.00	\$108.00
Service	03/15/2024	JR	z2 - Case Administration: Coordinate filing of Notice of Motion (Subject: URGENT: MAILING COMPLETED CERTIFICATE READY FOR YOU TO FILE CASE NO: 23-10566-KHK NAME: Eagle Properties & Investment, LLC TRACKING NUMBER: 7332253684)	0.20	\$485.00	\$97.00
Service	03/18/2024	JTM	z2 - Case Administration: Meet with M. Jain regarding Motion to Reconsider; prepare for hearing	1.80	\$550.00	\$990.00
Service	03/18/2024	SP	z2 - Case Administration: Prepare exhibit binders for motion to reconsider.	1.20	\$180.00	\$216.00

Service	03/19/2024	JTM	z2 - Case Administration: Hearing on motion to convert	3.90	\$550.00	\$2,145.00
Non-billable entries						
Service	01/09/2024	JTM	z10 - Litigation: Attend hearing on sale and broker employment motions	1.50	\$550.00	\$825.00
						Subtotal
						\$38,275.00
						Total
						\$38,275.00

Detailed Statement of Account

Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
244	03/06/2024	\$65,882.56	\$0.00	\$65,882.56

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
304	05/10/2024	\$38,275.00	\$0.00	\$38,275.00
				Outstanding Balance
				\$104,157.56
				Total Amount Outstanding
				\$104,157.56

Please make all amounts payable to: Martin Law Group, P.C.

Please pay within 30 days.

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8065 Leesburg Pike, Suite 750
Vienna, VA 22182

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